

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CHARLES JOSEPH FREITAG, Jr., as
ADMINISTRATOR of the ESTATE OF
CHARLES JOSEPH FREITAG, SR.,**

**Plaintiff,
vs.**

COUNTY OF BUCKS, et al.

Defendants.

**CIVIL ACTION
NO. 2:19-cv-05750**

JOINT APPENDIX IN SUPPORT OF SUMMARY JUDGMENT

Exhibit Number	Joint Appendix	Description
Exhibit 01	JA0000001	Exhibit 01 - Amended Complaint
Exhibit 02	JA0000023	Exhibit 02 - SOP B-3.23
Exhibit 03	JA0000026	Exhibit 03 - SOP B-4.60
Exhibit 04	JA0000034	Exhibit 04 - SOP B-4.66
Exhibit 05	JA0000041	Exhibit 05 - Email to Deputy Warden Mitchell
Exhibit 06	JA0000043	Exhibit 06 – Dr. Cassidy Email 8.1.2018
Exhibit 07	JA0000045	Exhibit 07 - Email between Deputy Warden Mitchell and Carl -Metellus 8.24.2018
Exhibit 08	JA0000048	Exhibit 08 - Officer Activity Log
Exhibit 09	JA0000052	Exhibit 09 - Onisick Report
Exhibit 10	JA0000058	Exhibit 10 - Autopsy
Exhibit 11	JA0000064	Exhibit 11 - NCCHC May 2017 letter
Exhibit 12	JA0000110	Exhibit 12 - Records related to NCCHC
Exhibit 13	JA0000125	Exhibit 13 - Moody Training Transcript
Exhibit 14	JA0000130	Exhibit 14 - Murphy Training Transcript
Exhibit 15	JA0000139	Exhibit 15 - Young Training Transcript
Exhibit 16	JA0000150	Exhibit 16 - Murphy Deposition
Exhibit 17	JA0000159	Exhibit 17 - Moody Deposition
Exhibit 18	JA0000174	Exhibit 18 - Young Deposition
Exhibit 19	JA0000185	Exhibit 19 - Nottingham Deposition
Exhibit 20	JA0000193	Exhibit 20 - Mitchell Deposition
Exhibit 21	JA0000197	Exhibit 21 - Metellus Deposition

Exhibit 22	JA0000200	Exhibit 22 - August 25, 2018 starting at 8:13 a.m.
Exhibit 23	JA0000201	Exhibit 23 - August 25, 2018 starting at 9:13 a.m.
Exhibit 23(a)-(l)	JA0000201(a)	Exhibit 23(a) to (l) - Screenshots of Mr. Freitag's Movement
Exhibit 23(m)	JA0000201(a)	Exhibit 23(a) – Screenshots of Officer Murphy Tour 10:04 a.m.
Exhibit 24	JA0000202	Exhibit 24 – August 25, 2018 Video starting at 10:13 a.m.
Exhibit 24(a)	JA0000202	Exhibit 24(a) Screenshots of Officer Murphy Tour 10:21 a.m.
Exhibit 25	JA0000203	Exhibit 25 - Gravette Report and Attachments (Corrections)
Exhibit 26	JA0000226	Exhibit 26 - Perrien Report and Attachments (Correctional Psychology)
Exhibit 27	JA0000267	Exhibit 27 - Sperry Report and Attachments (Forensic Pathology)
Exhibit 28	JA0000313	Exhibit 28 - Verzilli Report and Attachments (Economics)
Exhibit 29	JA0000336	Exhibit 29 - Social Worker Case Notes
Exhibit 30	JA0000339	Exhibit 30 - Offender Management - Alerts
Exhibit 31	JA0000341	Exhibit 31 - Treatment Services
Exhibit 32	JA0000345	Exhibit 32 - Inmate monitor form (8-24 10 pm - 8-25)
Exhibit 33	JA0000348	Exhibit 33 - Bochenek 10-24-19 incident report
Exhibit 34	JA0000350	Exhibit 34 - DiSandro report re prisoner interviews
Exhibit 35	JA0000352	Exhibit 35 - Bochenek Investigation report
Exhibit 36	JA0000354	Exhibit 36 - Officer Young Incident Report
Exhibit 37	JA0000356	Exhibit 37 - Officer Moody Incident Report
Exhibit 38	JA0000358	Exhibit 38 - PrimeCare Mortality Review
Exhibit 39	JA0000367	Exhibit 39 - Penge resume
Exhibit 40	JA0000370	Exhibit 40 - Mahoney resume
Exhibit 41	JA0000373	Exhibit 41 - Annual report re PCM MH care
Exhibit 42	JA0000380	Exhibit 42 - Job descriptions
Exhibit 43	JA0000389	Exhibit 43 - Mahoney letter
Exhibit 44	JA0000391	Exhibit 44 - Suicide Prevention Policy
Exhibit 45	JA0000404	Exhibit 45 - Medical Records
Exhibit 46	JA0000710	Exhibit 46 - Photo of Cups
Exhibit 47	JA0000712	Exhibit 47 - Hugh Caldwell statement
Exhibit 48	JA0000715	Exhibit 48 - Notice of Deposition - Bucks County 30(b)(6) 2021-05-05-2
Exhibit 49	JA0000719	Exhibit 49 - Bucks DA Report 2018-0684

Exhibit 50	JA0000725	Exhibit 50 - PrimeCare Email re MH Hours
Exhibit 51	JA0000727	Exhibit 51 - Brautigam Resume
Exhibit 52	JA0000731	Exhibit 52 - James Resume
Exhibit 53	JA0000734	Exhibit 53 - Notice of Deposition - PrimeCare 2021-06-09
Exhibit 54	JA0000737	Exhibit 54 - Notice of Deposition - Bucks County 2022-04-26
Exhibit 55	JA0000740	Exhibit 55 - Suicide Prevention Program (2019) (Bucks)
Exhibit 56	JA0000752	Exhibit 56 - Mental Health Screening and Evaluation (2019) (Bucks)
Exhibit 57	JA0000756	Exhibit 57 - Police Criminal Complaint
Exhibit 58	JA0000759	Exhibit 58-Primecare Summary of Medical Contacts
Exhibit 59	JA0000761	Exhibit 59 - Weber Deposition
Exhibit 60	JA0000781	Exhibit 60 - Mahoney Deposition
Exhibit 61	JA0000787	Exhibit 61 - Scordellis Deposition
Exhibit 62	JA0000790	Exhibit 62 - Freitag Robert Deposition
Exhibit 63	JA0000797	Exhibit 63 – Second Nottingham Deposition

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